

Ms. Erinn D. Larkin  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, DC 20463

Re: Human Rights Campaign PAC (October 2008 Monthly Report)  
Identification Number: C00235853

Dear Ms. Larkin:

This letter responds to your request for additional information dated January 14, 2009 regarding HRC PAC's Amended October 2008 Monthly Report.

As described in detail in our correspondence of December 2, 2008, HRC PAC has established procedures consistent with the FEC's "best efforts" regulations. In response to previous letters, HRC PAC initiated a further review of its procedures in order to regularly obtain updated contributor information from recurring contributors, i.e., contributors who make monthly, quarterly or annual contributions to HRC PAC.

We appreciate the guidance chart of individual inadequate employer(s)/occupation(s) and are in the process of mailing "best efforts" letters to the individuals you identified, notifying them that the employer and/or occupation information they provided is inadequate. We also have initiated further steps to integrate your guidance into our future "best efforts" procedures. HRC PAC will continue to amend reports or update future reports as appropriate.

I hope this additional information answers your specific requests. Should you need further information, please feel free to contact me at (202) 216-1549 or Darrin Hurwitz, HRC Assistant General Counsel, at (202) 572-8914.

Sincerely,

Jim Rinefied  
Treasurer